

REMARKS

Claims 14-21 were pending as of the action mailed on October 7, 2008. Claim 14 is in independent form. Claims 14-15 are being amended for clarity and to correct a typographical error. No new matter has been added.

Reconsideration of the action is respectfully requested in light of the foregoing amendments and the following remarks.

The examiner rejected claims 14-21 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,724,593 ("Hargrave").

Section 102 Rejections

Claim 14

Claim 14 recites a search method that includes obtaining a query including one or more terms where each term is written in a first format and translating the one or more terms of the query into a group of translated queries, each translated query having one or more terms in a second format. Thus, the terms of a received query written in one format are translated into a group of translated queries having terms written in a second format.

The method further includes searching a database for information responsive to one or more translated queries of the group of translated queries and returning search results written in the second format to the user, the search results referencing one or more documents responsive to the one or more translated queries. Thus, the searching is performed using translated queries of the group of translated queries.

The examiner states that Hargrave discloses searching a database for information responsive to one or more translated queries of the group of translated queries at col. 2, lines 38-44, col. 4, lines 22-26, col. 5, lines 10-22, and col. 14, lines 6-8. The applicant respectfully disagrees.

Hargrave discloses techniques for computer assisted translation of text strings in a source language to target language text strings. *See Abstract.* Hargrave uses pointers mapping source language n-grams with aligned target language n-grams. *See Abstract.*

In particular, the cited portions relied upon by the examiner are associated with a translation memory. Hargrave defines a translation memory as follows:

A translation memory is a database that collects translations as they are performed along with the source language equivalents. After a number of translations have been performed and stored in the translation memory, it can be accessed to assist new translations where the new translation includes identical or similar source language text as has been included in the translation memory (col. 2, lines 39-45).

The translation memory is a machine assisted translation tool for assisting human translators rather than for autonomously performing translations. *See* col. 2, lines 30-38. In particular, it aids a translator because the translator does not have to perform the same translation of particular source text fragments twice. *See* col. 2, lines 46-51. Thus, the translation memory is used to search for a particular source text fragment that has been previously translated such that the corresponding translation can be identified.

The search in Hargrove, therefore, is performed using the input in the source format (e.g., source language), not a translated format. The object of the search is to identify the translation of the input. By contrast, claim 14 requires the search to be performed responsive to one or more translated queries of the group of translated queries. In other words, the translation has already been performed prior to the claimed searching. The translation memory of Hargrave does not disclose or suggest the claimed searching a database for information responsive to one or more translated queries of the group of translated queries.

The remaining portions relied upon by the examiner also relate to Hargrave's translation memory. Specifically, col. 4, lines 22-26 of Hargrave discloses an aspect to improve retrieval time from the translation memory by indexing the pre-translated text using n-grams. *See* col. 4, lines 22-26. This refers to using n-grams of the source text to search for corresponding translations. The searching is not performed using the translated text, but instead using n-grams of the input text.

Col. 5, lines 10-22, of Hargrave read as follows:

In accordance with the present invention, the heart of the TM is an "aligned file" comprising a source language file that is broken into a plurality of text segments. Each text segment may be a word, group of words, phrase, sentence., or the like.

Each source language text segment is associated or aligned with a translated text segment in a target language. Many of the operations described below are performed only on the text strings in the source language file. However, it should be remembered throughout the discussion that each source language text segment is associated with a translated text segment in the aligned file thereby allowing searches of the source language text segments to produce translated text segments also.

The cited portion describes the structure of the translation memory. In particular, the translation memory includes a mapping between source language text and translated text. Furthermore, the cited portion states that as a result a search can be performed of the source language text segments in order to identify corresponding translated text segments. Thus, the cited portion explicitly discloses searching using the source language text to identify translated text. By contrast, claim 14 requires searching a database for information responsive to one or more translated queries of the group of translated queries.

Col. 14, lines 6-8 of Hargrave discloses that matches can be found when searching even if there is not an exact match. This refers to the "fuzzy matching" disclosed by Hargrave, for example, at col. 2, lines 58-67. However, this again refers to matching a source text to a translation using the translation memory. There is no searching performed using translated queries, as required by claim 14.

Therefore, none of the cited portions of Hargrave relied upon by the examiner disclose or suggest searching a database for information responsive to one or more translated queries of the group of translated queries. The applicant respectfully submits that claim 14, as well as claims 15-21, which depend from claim 14, are in condition for allowance.

Conclusion

For the foregoing reasons, the applicant submits that all the claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant's selecting some particular arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that

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claim exist. Finally, the applicant's decision to amend or cancel any claim should not be understood as implying that the applicant agrees with any positions taken by the examiner with respect to that claim or other claims.

Please apply any other credits or charges to Deposit Account No. 06-1050.

Respectfully submitted,

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